

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

PLAINTIFF,

and

THE VULCAN SOCIETY, INC., for itself and on behalf of its members, JAMEL NICHOLSON and RUSEBELL WILSON, individually and on behalf of a subclass of all other victims similarly situated seeking classwide injunctive relief,

ROGER GREGG, MARCUS HAYWOOD, and KEVIN WALKER, individually and on behalf of a subclass of all other non-hire victims similarly situated; and

CANDIDO NUÑEZ and KEVIN SIMPKINS, individually and on behalf of a subclass of all other delayed-hire victims similarly situated,

PLAINTIFF-INTERVENORS,

V.

THE CITY OF NEW YORK, ET AL.,

DEFENDANTS.

CIV. ACTION NO. 07-CV-2067  
(NGG)(RLM)

**STIPULATION OF DISMISSAL**

The parties hereby stipulate to the dismissal with prejudice of Plaintiff United States' claims in the above-captioned case pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii).

*See Hester Indus., Inc. v. Tyson Foods, Inc.*, 160 F.3d 911, 916 (2d. Cir. 1998); *Gambale v. Deutsche Bank AG*, 377 F.3d 133, 139 (2d. Cir 2004). *See also Morgulis v. Bus Patrol Am., LLC*, No. 24 CIV. 113 (ER), 2025 WL 1094855, at \*4 (S.D.N.Y. Apr. 11, 2025); *Gen. Foods Corp. v.*

*Jay V. Zimmerman Co.*, No. 86 CIV. 2697 (KMW), 1990 WL 115714, at \*1 (S.D.N.Y. Aug. 7, 1990).

The parties further stipulate that no party will seek attorneys' fees or costs from Plaintiff United States, nor will Plaintiff United States seek attorneys' fees or costs from any other party.

Date: May 7, 2025

Respectfully submitted,

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